



# Guidance & Policy

HS-GP-1

Privacy Office, TRICARE Management Activity

## HIPAA Security – Proposed Responsibilities for the Security Officer

### *Policy Implementation, Oversight, Auditing and Compliance*

- Manage the development and implementation of security policies, standards, guidelines, and procedures to ensure ongoing maintenance of the security of health information and compliance with the HIPAA Security Rule
- Identify and review the security features of existing and new computing systems to ensure that they meet the security requirements of existing policies. Review and propose changes to existing policies and procedures that reflect the existing requirements of the systems to which they apply. Periodically reassesses status and updated security standards established by the facility.
- Monitor day-to-day entity operations and systems for compliance. Report to management on the status of compliance.
- Periodically assess current security compliance status vs. necessary status (gap analysis).
- Work with management, the medical staff, the director of health information management, the privacy officer( if appointed separately), and others to ensure protection of patient privacy and confidentiality in a manner that does not compromise the entity, its personnel, good medical practice, or proper health information management practices.
- Develop and/or ensure internal controls are capable of preventing and detecting significant instances or patterns of illegal, unethical, or improper conduct.
- Coordinate or oversee the filing of regulatory forms, reports, etc. Assist other departments in understanding and complying with regulatory requirements. Work with appropriate individuals to ensure facility implements and maintains appropriate security forms, materials, processes, procedures, and practices.
- Coordinate and oversee regulatory submissions and reporting activities.
- Respond to alleged violations of rules, regulations, policies, procedures, and codes of conduct by evaluating or recommending the initiation of investigative procedures.
- Identify potential areas of compliance vulnerability and risk; develop/implement corrective action plans for the resolution of problematic issues and provide guidance on how to avoid or deal with similar situations.



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- Establish and chair an institutional Compliance Committee to bring entity into overall compliance. Assure the committee consists of relevant personnel appropriate for the purpose.
- Perform internal audit of data access and use to detect and deter breaches.
- Receive reports of Security breaches, take appropriate action to minimize harm, investigate breaches, and make recommendations to management for corrective action.

## ***Education, Training and Communication***

- Provide facility's information security policies and practices for employees and others with access to health information. Prepare and publish papers/articles on good security practices for facility's employees and others. Ensure that training conforms to existing policies and procedures.
- Communicate the importance of compliance and the compliance program to senior management, the compliance committee, and other members of the healthcare workforce.
- Promote the use of the compliance helpline, increase awareness of integrity and compliance and foster understanding of new and existing compliance issues and related policies and procedures.
- Work with leadership to ensure that they and all employees have the requisite information and knowledge of regulatory issues and requirements to carry out their responsibilities in a lawful and ethical manner.
- Provide input and/or direction to the employee performance appraisal and incentive programs to ensure improper conduct is reported and discouraged and that support of and conformity with the compliance program is part of any performance evaluation process for all employees.

## ***MTF Integration Activities***

- Work in cooperation with human resources, administration, and legal counsel, as appropriate to ensure consistent action is taken for failure to comply with security policies for all employees on the workforce.
- Function as key representative/liaison in meetings regarding regulatory policy.